



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

MAY 23 1987

Richard E. Freudenberger, Vice President
Environmental Strategies Corp.
8521 Leesburg Pike, Suite 650
Vienna, VA 22180

Re: Hellertown Site
Off Site Sampling Proposal

Dear Mr. Freudenberger:

Michael Bass, Hydrogeologist, and I have reviewed ESC's Proposal to Sample Off Site Wells near the Hellertown Site, submitted to EPA on May 8, 1987. I spoke briefly with Lou Martino on May 14, 1987 regarding comments about the report and have summarized our concerns below.

The proposed off site sampling plan states that its objective is to further delineate contaminant migration. This is fully satisfactory, however, EPA feels that the objective which is of primary concern is to ascertain whether the quality of domestic water supplies within the potential contaminant migration path have been effected. This objective is not stated in the sampling proposal and should be included.

The wells chosen for sampling by ESC are acceptable for planning additional investigations. Water quality data from these wells, however, are most probably not useful for Remedial Investigations purposes since EPA requires that monitoring wells draw from discreet depth intervals in an aquifer. EPA monitoring wells generally have approximately ten foot screened intervals to assure that the water sampled is from one discreet level and lithologic zone. Water supply wells are generally open over much longer depth intervals to maximize the supply that can be extracted from the well. Therefore, dilution can often occur before sampling and high levels of contamination may not be detected.

Specific EPA comments are as follows:

1. Page 1 - The Agency requires that a full priority pollutant scan be performed at least once for each sampling location, rather than scanning only for the Hazardous Substance List volatiles which were proposed in the sampling plan.
2. Page 2 - Apparently there is a lack of current information on each of the four wells which have been selected for sampling. Information which should be gathered and incorporated into the plan is the specific location of Well A and Well 54. Once the location and owner of the wells are determined, EPA can contact and inform the owner that sampling will be taking place.

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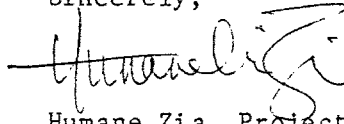
If available, ESC should include a great deal of additional information in Table 1. This information should include the length of the screened interval, methods of construction, any available well logs, the elevation of the screened interval and the depth to and number of any water bearing zones.

3. Page 9; SOP FS-5 - Water drawn from contaminated wells should not be discharged to the surface without approval from EPA or PADER.

As previously stressed by EPA to both ESC and Champion Spark Plug Co., EPA can only formally approve of this or other upcoming projects after we have signed a Consent Order with Champion and have approved ESC's Workplan for the Hellertown site.

Please call me if you have any questions regarding the above.

Sincerely,



Humane Zia, Project Manager
PA CERCLA Remedial Enforcement Section

cc: Terry Rife, Champion Spark Plug Co.

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